

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE GLOBAL BROKERAGE, INC. f/k/a
FXCM INC. SECURITIES LITIGATION

Master File No. 1:17-cv-00916(RA)(BCM)

CLASS ACTION

This Document Relates To: All Actions

DECLARATION OF JOSHUA BAKER

I, Joshua Baker, hereby declare:

1. I am an attorney admitted to practice before this Court. I am an attorney with The Rosen Law Firm, P.A., Court-appointed Lead Counsel for Lead Plaintiffs 683 Capital Partners, LP (“683 Capital”) and Shipco Transport Inc. (“Shipco”), and proposed Class Counsel. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so truthfully and accurately. I make this declaration, together with the attached exhibits, in further support of Plaintiffs’ Amended Motion for Class Certification and Appointment of Class Representatives and Class Counsel. Dkt. No. 174.

2. Attached hereto as Exhibit 10 is a true and correct copy of screenshots from Bloomberg Terminal, showing the names of FXCM Notes holders and their respective holdings of FXCM Notes as of the last date of each calendar quarter between Q2 2014 and Q1 2017, inclusive. I have identified 83 unique holders of FXCM Notes during these quarters. I calculate that 43 of these holders are no longer identified as holders in the Bloomberg data by the end of Q4 2016.

3. I have identified five entities who both (1) signed the forbearance agreement referenced by Defendants in their opposition papers and during oral argument, and (2) appear on the list of holders during the Notes Period: Credit Suisse, Jefferies Group LLC, Penderfund Capital Management Ltd., Zazove Associates LLC, and Phoenix Investment Adviser LLC.

4. Attached hereto as Exhibit 11 is a list I generated of 35 potential members of the proposed FXCM Notes sub-class who are identified in the Bloomberg data in Exhibit 10 as having (1) held FXCM Notes during the Notes Period, (2) not sold prior to the end of the Notes Period, and (3) not signed the forbearance agreement releasing their claims.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 21, 2020, in Jenkintown, Pennsylvania.

/s/ Joshua Baker
Joshua Baker

DECLARATION OF JOSHUA BAKER

CERTIFICATE OF SERVICE

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On October 21, 2020, I served true and correct copies of the foregoing DECLARATION OF JOSHUA BAKER and EXHIBITS 10-11, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 21, 2020, at Jenkintown, Pennsylvania.

/s/ Joshua Baker
Joshua Baker